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**LAW OFFICE of
JULIA KEFALINOS**

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MEMO ENDORSED

January 13, 2021

VIA CMECF

Honorable Valerie E. Caproni
United States District Court Judge
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007-1312

Re: **U.S. v. Maria Fernanda Gutierrez Ospino** 20-cr-00102-VEC

Dear Judge Caproni:

I write on behalf of my client, Maria Fernanda Gutierrez Ospino and with the consent of the Government to request a six (6) month adjournment of the sentencing currently set for February 25, 2021 and an enlargement of the February 11, 2021 deadline for filing pre-sentencing submissions in the above referenced case for the following reasons:

1. Ms. Gutierrez-Ospino is diligently working on getting some correspondence from her family in Venezuela which is relevant to the sentencing.
2. The Covid-19 pandemic has escalated even beyond the point of its inception last year when this case was filed.
3. Ms. Gutierrez-Ospino has a young baby. It is unsafe for Ms. Gutierrez-Ospino to travel with her until the vaccines are further underway and the circumstances of the Covid-19 pandemic improve.
4. The uncertainty and of the current travel restrictions, limitations on court proceedings, potential requirement to quarantine in New York State due to the COVID-19 pandemic. The defendant lives in Miami, Florida which was previously the epicenter for COVID-19.

The parties' consent to the exclusion of time under the Speedy Trial Act through the next conference date scheduled by the court. Thank you for your consideration of this request.

Respectfully submitted,

/s/Julia Kefalinos, Esq

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cc: *Samuel Rothschild, Assistant U.S. Attorney*

Application GRANTED.

Ms. Gutierrez's sentencing, currently scheduled for February 25, 2021, is hereby adjourned to **Thursday, August 26, 2021, at 11:00 A.M.** Pre-sentencing submissions are due no later than **Thursday, August 5, 2021.**

The sentencing will be held in Courtroom 443 of the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, New York 10007. Interested members of the public may attend by dialing 1-888-363-4749, using the access code 3121171 and the security code 0102. All of those accessing the hearing are reminded that recording or rebroadcasting of the proceeding is prohibited by law.

It is further ordered that Ms. Gutierrez's bail conditions will continue through her sentencing.

SO ORDERED.



Date: January 13, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE